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Dear Steven Clarke,

I would like to thank the Massachusetts Advanced Biofuels Task Force for the opportunity to submit our written testimony on the "Act Furthering the Biofuels Clean Energy Sector". It is critical that Massachusetts tackles the challenge of global warming using an array of tools and incentives. Clean Water Action is in support of biofuels investment and research, but has concerns about the unintended environmental impacts that biofuels mandates may cause.

We urge the Biofuels Task Force to safeguard that biofuels investment and development does not create unintended environmental externalities that cause more harm than good. For example, Europe's rush to oil palm and soya biomass as sources of renewable energy, were misguided and fueled the destruction of Indonesian rainforests to produce Palm Oil.¹ Increases in Soy prices have also impacted Brazil's richest ecological areas, that have been plowed under for crops and fuel, threatening to make 2008 year the most disastrous for the world's most important ecosystem.²

Furthermore, biofuels development has also led to increases in food prices worldwide, affecting the poor and at-risk communities' access to food. In June 2007, Chinese leaders had placed a moratorium on biofuels production due to an increase of pork prices by 43 percent.³ It is important that we take actions to reduce the commonwealth's carbon footprint, but the evidence is mounting that many biofuels have large carbon footprints and are converting food to fuel production.

Clean Water Action is concerned about the following provisions in the "Act Furthering the Biofuels Clean Energy Sector".

1. Fuel mandates for residential, commercial, and industrial use of 2% by 2010 and 5% by 2013. This mandate will require significant amounts of plant materials converted into biofuels and the current sustainable language in the bill does not safeguard against a number of environmental externalities such as converting food production into biofuels and ecological niches into fuel plantations as in Indonesia and Brazil.

¹ <http://www.nytimes.com/2008/01/15/business/worldbusiness/15biofuel.html>

² <http://prod.independent.co.uk/environment/green-living/destruction-of-rainforest-accelerates-despite-outcry-770904.html>

³ <http://www.timesonline.co.uk/tol/news/world/asia/china/article1917927.ece>

2. In section 3, Chapter 94 of the bill, biodiesel fuel is classified as renewable, biodegradable, mono alkyl ester combustible liquid fuel derived from agricultural plant oils or animal fats. Current feedstocks available to the commonwealth consists of biogrease, which is in limited supply, and soybean oil, a current food source that would be converted into fuel.

3. Furthermore, these environmental externalities cannot be tracked, as accredited manufacturers are only able to document "sustainable biofuels sources". The bill in its current form can not account for forestland and other natural spaces being inadvertently converted into farms to meet the demands for food production caused by displacing lands for biofuels.

We feel strongly that the following provisions must be added to ensure this policy result in the successful development of a cleaner fuel source for the commonwealth of Massachusetts.

1. Establish a Low Carbon Fuel Standard (LCFS) based upon the model set by the Governor's Executive Order in California. The LCFS is the world's first global warming standard for transportation fuels, and as with other groundbreaking California policies, it may serve as a model for state, federal and international standards. "An Act Furthering the Biofuels Energy Sector" should ensure that biofuel production proves to have a net reduction of global warming pollution on a lifecycle basis in order to receive the benefits of tax incentives.
2. Protect public health and mitigate pollution associated with industrial agriculture by promoting ecologically sound bioenergy systems with stringent oversight of crop production. Land, water, and soil use should be monitored to avoid impacts on food supplies and agricultural prices from cultivation, production, and distribution of biofuels. This bill needs to outline sustainable forestry practices and preserve agricultural land use that does not sacrifice food production for fuel. Furthermore these provisions must apply to out of state imports which must be verifiable and meet the same standards for full life cycle production.
3. Add specific safeguards that ensure bioenergy investments and expand economic opportunity in those communities where biomass is produced and processed. This can be accomplished by giving incentives to smaller scale agricultural production that uses sustainable practices such as no till farming, converts agricultural wastes into fuel, and grows more carbon friendly crops such as rapeseed. It is important that Massachusetts maintain and cultivate family owned farms and local businesses to maintain the character and economic vibrancy of the region. Industrial mass agribusiness

inflicts environmental and social costs on communities and the biofuels act needs to invest in local sustainable businesses that brings sustainable jobs to rural communities.

4. Ensures that biofuels meet the Department of Environmental Protection ambient air quality standards for the commonwealth of Massachusetts. Biofuels should not breach emissions for Sulfur Oxides, particulate matter, nitrogen oxide, and other noxious air pollutants, which harms the public health.

To combat global warming, the commonwealth of Massachusetts should utilize many tools and strategies including biofuels production, but biofuels alone can not address greenhouse gas pollution from the transportation and energy sectors or replace these energy needs. We urge the commonwealth to adopt policies that combine bioenergy with efficiency, conservation, and smart growth to transition to a sustainable transportation system.

Biofuels in and of itself, does not address that the fastest growing use of fossil fuels are in the transportation sector. Massachusetts loses 40 acres every day to sprawling development, and it loses an additional 38 acres to the "hidden" cost of development, such as road construction.⁴ Suburban sprawl, lack of affordable and efficient mass transit, low fuel standards, and inefficient land policy contribute to an ever-growing fuel demand. More must be done in the commonwealth to address inefficient land use and transportation systems.

We urge the Massachusetts Advanced Biofuels Task Force to move forward using the precautionary principle and adopt the Low Carbon Fuel Standard and other provisions to ensure that biofuels development would actually decrease GHG emissions and protect land, food, and water resources in the commonwealth and around the world.

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⁴ <http://www.commondreams.org/archive/2007/09/06/3665/>